

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY**

LAW OFFICES OF NONA L. OSTROVE, LLC  
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Attorneys for Sturbridge Lakes Association, Inc.  
BY: Nona L. Ostrove, Esq. NO 2942

In re: : IN BANKRUPTCY  
: CHAPTER 13  
Wade Cohen :  
: CASE NO. 16-31482/ABA  
: :  
Debtor : :

**OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN**

Sturbridge Lakes Association, Inc. through its attorney, Law Offices of Nona L. Ostrove, LLC, objects to confirmation of the debtor's Chapter 13 plan for the following reasons:

1. Sturbridge Lakes Association, Inc. ("Sturbridge") is a creditor of the debtor herein by reason of unpaid homeowner association assessments owed on the debtor's residence at 23 Tenby Chase Drive, Voorhees, NJ. These assessments are secured by provision of the Amended Declaration of Covenants, Restrictions, Easements, Charges and Liens and a lien filed with the Camden County Clerk's Office on December 21, 2015. A proof of claim has been filed confirming the balance due as of the filing of the petition, \$1,985.73.

2. Section 1328(a)(5)(B)(ii) of the Bankruptcy Code states that with respect to an allowed secured claim, the plan must provide for payment of "the value, as of the effective date of the plan, of property to be distributed under the plan on account of such claim is not less than the allowed amount of such claim;..." Section 1325(a)(5)(B)(i)(I) further states that the plan must provide that "the holder of such claim retain the lien securing such claim..."

3. The current plan filed by the debtor provides for payment to Sturbridge of \$1,200.00. Sturbridge objects to confirmation of the current plan proposed by the debtor unless the plan is amended to provide for payment in full of Sturbridge's secured claim.

WHEREFORE, Sturbridge Lakes Association, Inc. objects to confirmation of the Debtor's Chapter 13 plan unless the plan is modified to provide for payment of all assessments due and owing to Sturbridge Lakes Association, Inc. together with all allowed interest and attorney fees and costs together with all post-petition assessments that come due and for such further relief as the court may deem proper and just.

LAW OFFICES OF NONA L OSTROVE, LLC  
Attorneys for Sturbridge Lakes Association, Inc.

BY: /s/Nona L. Ostrove  
Nona L. Ostrove, Esq.

Dated: January 4, 2017